

1. Debtor filed the instant Chapter 13, Case Number 18-16305 on October 19, 2018.
2. Debtor's previously filed a Chapter 13 Case No.17-12353 was dismissed September 17, 2018.
3. Debtors' previous Chapter 13 case #17-12353 was dismissed for failing to make their Chapter 13 payments.

4. Unfortunately, the Debtor was only working part-time and was struggling financially to satisfy all her obligations.
5. However, the Debtor has since retained full-time employment and her husband has also received an increase in pay, therefore the Debtor feels confident she can afford her plan payments.
6. The Debtor is fully aware of all their obligations and intend to fullfill their obligatons and comply with his Chapter 13 plan. (See Affidavit of Kimberly Yavonne Bustamante).
7. The petition in the instant case was filed in good faith. Debtors believe that the Chapter 13 Plan submitted will be confirmed and that the Debtor will be able to fully perform under the terms of the Plan.
8. The Debtor's prior Chapter 13 case 18-16041 was dismissed in September 14, 2018, was the only prior case by the Debtor that was pending during the year.

WHEREFORE, Debtors pray that this Court continues imposition of the automatic stay under § 362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under § 362(c)(1) or (c)(2) or a motion for relief is granted under § 362(d), and allow this motion to be heard on OST, prior to November 08, 2018.

Debtor further requests that LR 9021 be waived in the instant matter.

Dated: October 22, 2018

/s/George Haines, Esq.
George Haines, Esq.
Attorney for Debtor(s)